## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
v.	)	Criminal No. 04-10194-RCI
ANTHONY BUCCI, et al.,	)	
Defendants.	)	

## JOINT MOTION FOR EXCLUSION OF TIME **UNDER SPEEDY TRIAL ACT**

In accordance with the Court's request at the Interim Status Conference held on February 17, 2005, the United States of America and the defendants, by and through their respective counsel, hereby submit this joint motion for the exclusion of time under the Speedy Trial Act.

With the exception of a nine day period between July 6, 2004, and July 14, 2004, the Court has excluded from the Speedy Trial Act calculation all time from the date of the Indictment through December 14, 2004. Since that date the defendants have requested additional time to review the discovery provided to date and to evaluate the need for filing dispositive motions. In addition, two of the defendants have submitted motions seeking to revise the terms of their pre-trial release, and those motions are currently pending. The parties agree that it is in the interests of justice to exclude from the Speedy Trial Act calculation the period from December 14, 2004, through the final status conference scheduled for March 17, 2005, and

Respectfully Submitted,

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/s/ John T. McNeil By:

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/s/ John T. McNeil for

MICHAEL NATOLA Counsel for Defendant BUCCI

/s/ John T. McNeil for

THOMAS DRECHSLER Counsel for Defendant JORDAN

/s/ John T. McNeil for

KEVIN L. BARRON Counsel for Defendant MUOLO

Dated: March 3, 2005